

Geraldine M. Johnson (0010450)
Attorney for Plaintiff,
Jefferson-Pilot Life Insurance Co.

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

JEFFERSON-PILOT LIFE	:	CASE NO. C-1-02-479
INSURANCE COMPANY,	:	
	:	JUDGE SPIEGEL
Plaintiff,	:	
	:	PLAINTIFF JEFFERSON-PILOT
v.	:	LIFE INSURANCE COMPANY'S
	:	REQUEST FOR EXTENSION OF
CHRISTOPHER L. KEARNEY,	:	TIME TO RESPOND TO
	:	DEFENDANT KEARNEY'S MOTION
Defendant.	:	FOR SUMMARY JUDGMENT

Now comes the Plaintiff Jefferson-Pilot Life Insurance Company, by and through its counsel , and hereby requests a forty-five (45) day extension of time within which to respond to Defendant Kearney's Motion for Summary Judgment. Plaintiff requests that the new deadline be January 6, 2004. The basis for this request is that Defendant's Motion for Summary Judgment is based in part on the Affidavits of Christopher Kearney and an expert witness, Clinton E. Miller, who resides in Santa Clara County, California. In order to properly respond to this Motion, Plaintiff needs to take the deposition of Christopher Kearney as well as the deposition of Mr. Miller. Given the fact that Mr. Miller lives in California and Mr. Kearney lives in Northeast Ohio coupled with the holiday season in late December, Plaintiff believes that from a practical standpoint this extension is neither unreasonable nor prejudicial to the Defendant. Plaintiff has not requested any prior extensions.

Respectfully submitted,

s/ Geraldine M. Johnson

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT on November 21, 2003, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Eugene L. Matan, Esq., Matan, Geer & Wright, 261 South Front Street, Columbus, Ohio 43215.

s/ Geraldine M. Johnson

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**JEFFERSON-PILOT LIFE
INSURANCE COMPANY,**

Plaintiff,

v.

CHRISTOPHER L. KEARNEY,

Defendant.

: CASE NO. C-1-02-479
:
: JUDGE SPIEGEL
:
: ENTRY GRANTING PLAINTIFF'S
: REQUEST FOR EXTENSION OF
: TIME TO RESPOND TO DEFENDANT
: KEARNEY'S MOTION FOR
: SUMMARY JUDGMENT
:

Upon Motion by Plaintiff Jefferson-Pilot Life Insurance Company, by and through its counsel, Plaintiff is hereby granted an extension until January 6, 2004 as its deadline to respond to the Defendant's Motion for Summary Judgment.

IT IS SO ORDERED.

JUDGE SPIEGEL